

# **EXHIBIT 188**

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**From:** Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>

**Date:** Wednesday, Jul 27, 2022, 2:53 PM

**To:** Josh Belinfante <[Josh.Belinfante@robbsfirm.com](mailto:Josh.Belinfante@robbsfirm.com)>, Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>, Vincent Russo <[vrusso@robbsfirm.com](mailto:vrusso@robbsfirm.com)>, Carey Miller <[carey.miller@robbsfirm.com](mailto:carey.miller@robbsfirm.com)>

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**Subject:** JSON Format Cast Vote Records on the Internet

**External Email**

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Josh, Bryan, Vincent and Carey,

As you may already know, on a public internet site there appears to be Coffee County's November 2020 Cast Vote Records in json format. Based on the file date, the files appear to have been created and acquired for publication long before json format Cast Vote Records were permitted to be released as public records by the Secretary of State.

The files dated 1/17/21 are posted at this website:

<https://ordros.com/cvr/index.html> and specifically at <https://ordros.com/cvr/Georgia/Coffee/>

Until approximately November 2021, the Secretary of State instructed counties not to produce such CVRs in response to public records requests, and considered CVRs to be non-public files. These files are dated January 17, 2021, ten days after the alleged breach and imaging of the Coffee County server. As we understand it, json format CVRs can only be created with access to the EMS software and the specific election database.

Our experts will review the files and may testify as to their authenticity and import.

We ask the State Defendants to confirm that these files are authentic, as they appear to be. If you are unable or unwilling to do so, we again request access to the seized Coffee County server and ICC for our experts to evaluate.

We also ask that you ensure your 30b6 witness reviews these files and any related data and documents to be prepared to testify about them and their connection to any improper access to Georgia's voting system.

Thanks,

Bruce

**Exhibit**  
**0021**

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Ordros Analytics has received numerous Cast Vote Record files from counties all over the United States, and continues to receive more. If you encounter a CVR that you believe to be non-public, or find a cvr that is mis-identified, please click [HERE](#) to email us and we will verify that the CVR was received in reply to a lawful public records request.

[CLICK HERE TO ENTER THE CVR REPOSITORY](#)

[Download CAST VOTE RECORDS FOR DUMMIES - INSTRUCTIONS ON HOW TO REQUEST CVRs FROM YOUR STATE/COUNTY!](#)

[CLICK HERE TO VIEW THE NUMBER WE HAVE FOR EACH STATE](#)

[WHAT EQUIPMENT DOES MY COUNTY USE?](#)

[HART/INTERCIVIC CVR GENERATION INFORMATION](#)

Here is an example FOIA request:

Pursuant to (stat name)'s Public Records Act (Chapter XX, section XX of the (state name) Statutes ), I am requesting a copy of the (county name) County Cast Vote Record (CVR) report, in a digital format, for all of the elections that were on the ballot for the November 3, 2020 General Election. Attached is a sample header from this report that was provided by another county. If possible, please add in any available timestamp fields.

Dominion Voting Systems instructions to produce a Cast Vote Record can be found in Chapter 14 of the RTR Reporting Manual.

# ordros.com - /cvr/Georgia/Coffee/

[\[To Parent Directory\]](#)

1/17/2021	5:00 PM	3149	<a href="#">BallotTypeContestManifest.json</a>
1/17/2021	5:00 PM	385	<a href="#">BallotTypeManifest.json</a>
1/17/2021	5:00 PM	6799	<a href="#">CandidateManifest.json</a>
1/17/2021	4:59 PM	402	<a href="#">Configuration.json</a>
1/17/2021	5:00 PM	2359	<a href="#">ContestManifest.json</a>
1/17/2021	5:00 PM	257	<a href="#">CountingGroupManifest.json</a>
1/17/2021	5:00 PM	64042514	<a href="#">CvrExport.json</a>
1/17/2021	5:00 PM	3244	<a href="#">DistrictManifest.json</a>
1/17/2021	5:00 PM	12698	<a href="#">DistrictPrecinctPortionManifest.json</a>
1/17/2021	5:00 PM	1579	<a href="#">DistrictTypeManifest.json</a>
1/17/2021	5:00 PM	273	<a href="#">ElectionEventManifest.json</a>
1/17/2021	5:00 PM	243	<a href="#">OutstackConditionManifest.json</a>
1/17/2021	5:00 PM	346	<a href="#">PartyManifest.json</a>
1/17/2021	5:00 PM	343	<a href="#">PrecinctManifest.json</a>
1/17/2021	5:00 PM	2049	<a href="#">PrecinctPortionManifest.json</a>
1/17/2021	5:00 PM	3286	<a href="#">TabulatorManifest.json</a>